May 22, 2001

Kentucky Registry of Election Finance c/o Ms. Sarah Jackson 140 Walnut Street Frankfort, KY 40601

RE: Request for Advisory Opinion

Dear Ms. Jackson

I am Chair of the Louisville-Jefferson County Democratic Party and an official of it's Executive Committe, which sponsors annually the Wendell H. Ford Foundation Dinner as a fundraising event. Proceeds from this event are utilized to fund operational expenses of the local organization. My questions concern allocation of the money received from an individual dinner participant who contributes \$1,000 to purchase tickets and also make an expenditure by purchasing program advertising,, in all, a sum total of more than \$1,000, but less \$2,500.

Is it permissible to establish separate accounts for ticket proceeds and advertising proceeds, with each account being subject to the \$1,000 limitation for local party support or should total contributions received from an individual for ticket purchases and program advertising be combined for the \$1,000 limitation, with the excess thereof (up to \$2,500) being transferred to the Kentucky Democratic Party? What, if any, other lawful options are available to the Louisville-Jefferson County Democratic Executive Committee with respect to individual contributions in excess of \$1,000? These contributions also include Political Action Committees (PAC).

Thanking you in advance for your time and consideration in this matter.

Respectfully,

Larry Clark Chair

cc: C. Horton, Treasurer